

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	C.A. No. 16-122-LPS-CJB
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
GROUPON, INC.	)	
	)	
Defendant.	)	

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certifications counsel moves the admission pro hac vice of John M. Desmarais, Karim Oussayef and Robert C. Harrits of DESMARAIS LLP, 230 Park Avenue, New York, NY 10169 to represent Plaintiff International Business Machines Corporation in this matter.

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura  
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*Attorneys for Plaintiff  
International Business Machines Corporation*

Dated: March 15, 2016  
1218540 / 42141

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.

Date: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the District of Columbia and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective 7/23/09, I further certify that the annual fee of \$25.00

- ☐ has been paid to the Clerk of the Court.
- ☒ will be submitted to the Clerk's Office upon the filing of this motion.

Date: March 15, 2016

Signed: /s/ John M. Desmarais

John M. Desmarais  
DESMARAIS LLP  
230 Park Avenue  
New York, NY 10169  
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[jdesmarais@desmaraisllp.com](mailto:jdesmarais@desmaraisllp.com)

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the Commonwealth of Massachusetts and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

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Date: March 15, 2016

Signed: /s/ Karim Oussayef  
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**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

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Date: March 15, 2016

Signed: /s/ Robert C. Harrits

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